

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

ANDREW HINESLEY,

Plaintiff,

v.

GRAY TELEVISION, INC., d/b/a HAWAII NEWS
NOW,

Defendant.

No. 1:25-CV-11488

AFFIDAVIT IN SUPPORT OF RENEWED MOTION TO SEAL ENTIRE CASE

I, Andrew Hinesley, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am the Plaintiff in the above-captioned matter. This affidavit is submitted in support of my renewed motion and memorandum of law to seal the entire case, including all filings and docket entries.

2. The filings in this matter contain sensitive information, including expunged criminal records and sealed state court materials. Its public disclosure would cause irreparable harm to my privacy and reputation.

3. Making this information public would directly contravene existing state court orders and result in the re-publication of legally protected and prejudicial material.

4. Due to prior media coverage and professional inquiries, redacting individual portions of the filings would be insufficient to protect my identity or the sensitive nature of the material, especially as the public already associates me with the case.

5. Accordingly, I respectfully request that these documents, along with any other filings in this matter, be sealed in their entirety.

6. This renewed motion is being filed prior to final dismissal to preserve the Court's jurisdiction over this sealing request and to prevent further irreparable harm.

7. I make this declaration in good faith and not for any improper purpose.

8. I respectfully request that the Court grant the motion and seal the entire case file.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 06/12/2025.

/s/ Andrew Hinesley